

1 Marjorie Hauf, Esq.
 2 Nevada Bar No.: 8111
 3 Matthew G. Pfau, Esq.
 4 Nevada Bar No.: 11439
 5 Cara Xidis, Esq.
 6 Nevada Bar No.: 11743
 7 H&P LAW
 8 710 S. 9th Street
 9 Las Vegas, Nevada 89101
 10 702 598 4529 TEL
 11 702 598 3626 FAX
 12 e-file@courtroomproven.com
 13 Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

10 **Allyessa Tefft**, individually and as the
 11 natural parent of **B.M.T.**, a minor,

Case No.: 2:23-cv-00520-JAD-DJA

12 Plaintiffs,
 13 vs.

**Stipulation and Order to Extend
Discovery Deadlines
(Fourth Request)**

14 **State Farm Mutual Automobile
Insurance Company**; Does 1 through
 15 10, inclusive and Roe Corporations 1
 16 through 10, inclusive,

17 Defendants.

18 IT IS HEREBY STIPULATED AND AGREED by and between the parties hereto, by
 19 and through their respective counsel of record, that the discovery deadlines in this
 20 case be extended as follows:
 21

A. COMPLETED DISCOVERY

23 The parties have conducted the following discovery:
 24

- 25 1. Plaintiff has served her initial disclosure of witnesses and documents, and
 26 supplements thereto;
- 27 2. Defendant has served its initial disclosure of witnesses and documents, and
 28 supplements thereto;



- 1 3. Plaintiff has propounded and answered written discovery requests;
- 2 4. Defendant has propounded written discovery requests;
- 3 5. Plaintiff has taken the deposition of State Farm adjuster, Angela Vendetti.
- 4 6. Plaintiff has taken the deposition of State Farm adjuster, Lori Craig.
- 5 7. Plaintiff has taken the deposition of State Farm adjuster, Sydney Payne.
- 6 8. Defendant has taken the deposition of Plaintiff, Allyessa Tefft.

7

8 **B. OUTSTANDING DISCOVERY**

- 9 1. Disclosure of expert witnesses;
- 10 2. Deposition of the State Farm 30(b)(6) witness;
- 11 3. Depositions of fact witnesses;
- 12 4. Depositions of treating physicians;
- 13 5. Depositions of expert witnesses;
- 14 6. Additional written discovery;
- 15 7. Disclosure of additional documents.

16

17 **C. GOOD CAUSE EXISTS FOR AN EXTENSION**

18 Counsel for the parties have been diligent in conducting discovery but have
19 recently entered settlement negotiations and are planning to mediate this matter in
20 July or early August. In order to not incur unnecessary costs prior to mediation,
21 counsel for both parties agree that an extension of expert deadlines beyond August
22 is appropriate. Further, one of Plaintiff's retained experts has requested an
23 additional 30 days to complete his report.

24 Additionally, both parties are currently awaiting the decision on Defendant's
25 motion for protective order and Plaintiff's countermotion to compel. In order to
26 produce certain documents requested by Plaintiff, Defendant asserts that a
27 protective order is required. These documents are important for depositions and for
28 the experts in this matter. Therefore, there is good cause to extend the discovery

1 deadline as requested.
 2
 3

D. PROPOSED EXTENDED DEADLINES

4 The parties have agreed to extend the discovery deadlines in this case as follows:
 5

	CURRENT DEADLINE	PROPOSED DEADLINE
Motions to amend or add parties	Closed	Closed
Initial expert disclosures	June 10, 2024	September 9, 2024
Rebuttal expert disclosures	July 12, 2024	October 10, 2024
Close of Discovery	August 9, 2024	November 7, 2024
Dispositive motions	September 9, 2024	December 9, 2024
Pretrial Order	October 7, 2024	January 6, 2025 or, if dispositive motions are filed, 30 days after the entry of order on the dispositive motions.

14 Dated this 20th day of May, 2024.

H&P LAW

15 /s/ Marjorie Hauf

16 Marjorie Hauf, Esq.
 17 Nevada Bar No.: 8111
 18 Cara Xidis, Esq.
 19 Nevada Bar No.: 11743
 20 *Attorney for Plaintiff*

21 DATED this 20th day of May, 2024.

LEWIS BRISBOIS BISGAARD & SMITH

22 /s/ Frank Toddre II

23 Frank Toddre II, Esq.
 24 6385 S. Rainbow Blvd, Suite 600
 25 Las Vegas, NV 89118
 26 Fax: 702-893-3789
 27 *Attorney for Defendant*

28 ORDER

IT IS SO ORDERED.

DATED this 21st day of May, 2024.

UNITED STATES MAGISTRATE JUDGE